



## TITLE V OPERATING PERMIT

Issued pursuant to Title 22a of the Connecticut General Statutes (CGS) and Section 22a-174-33 of the Regulations of Connecticut State Agencies (RCSA) and pursuant to the Code of Federal Regulations (CFR), Title 40, Part 70.

<b>Title V Permit Number</b>	189-0184-TV
<b>Client/Sequence/Town/Premises Numbers</b>	6525/01/189/50
<b>Date Issued</b>	October 2, 2006
<b>Expiration Date</b>	October 2, 2011

**Corporation:**

CT Acquisitions LLC DBA Danver

**Premises location:**

1 Grand Street, Wallingford, CT 06492

**Name of Responsible Official and Title:**

Mitchell Slater – General Manager

All the following attached pages, 2 through 25, are hereby incorporated by reference into this Title V Operating Permit.

ANNE GOBIN  
Gina McCarthy  
Commissioner

OCTOBER 2, 2006  
Date

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## LIST OF ACRONYMS

<i>Acronym</i>	<i>Description</i>
ACFM	Actual cubic feet per minute
ASC	Actual Stack Concentration
BACT	Best Available Control Technology
BAM	Bureau of Air Management
CEM	Continuous Emission Monitor
CFR	Code of Federal Regulations
CO	Carbon Monoxide
CP/OP	Construction Permit/Operating Permit
CTG	Control Technology Guideline
DEP	Department of Environmental Protection
DSCF	Dry standard cubic feet
DSCM	Dry standard cubic meters
EMU	Emission Unit
ERC	Emission Reduction Credit
EPA	Environmental Protection Agency
FLER	Full load emission rate
GEU	Grouped Emission Unit
GPH	Gallons per hour
GPM	Gallons per minute
HAP	Hazardous Air Pollutant
HLV	Hazard Limiting Value
LAER	Lowest Achievable Emission Rate
MACT	Maximum Achievable Control Technology
MASC	Maximum Allowable Stack Concentration
MSDS	Material Safety Data Sheet
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO <sub>x</sub>	Nitrogen Oxides
NSR	New Source Review
PM	Particulate Matter
PPMV	Parts per million, volumetric basis
PTE	Potential to Emit
RACT	Reasonably Available Control Technology
RCSA	Regulations of Connecticut State Agencies
RMP	Risk Management Plan
SIC	Source Identification Code
SIP	State Implementation Plan
TOC	Total Organic Carbon
TPH	Tons per hour
TPY	Tons per year
TSP	Total Suspended Particulate
VOC	Volatile Organic Compound

## **Title V Operating Permit**

**All conditions in Sections III, IV, V, VI, VII, and IX of this permit are enforceable by both the Administrator and the Commissioner unless otherwise specified. Applicable requirements and compliance demonstration are set forth in Section III of this permit. The Administrator or any citizen of the United States may bring an action to enforce all permit terms or conditions or requirements contained in Sections III, IV, V, VI, VII, and IX of this permit in accordance with the Clean Air Act (CAA), as amended.**

## **Section I: Premises Information/Description**

### **A. PREMISES INFORMATION**

Nature of Business: Manufacturer of Steel Office Furniture  
Primary SIC: 2514; 2522  
Facility Mailing Address: CT Acquisitions LLC DBA Danver  
1 Grand Street  
Wallingford, CT 06492  
Telephone Number: (203) 269-2300

### **B. PREMISES DESCRIPTION**

CT Acquisitions LLC DBA Danver (Danver) is a manufacturer of steel office furniture and outdoor and indoor stainless steel cabinetry. The processes involved are vapor degreasing, powder coating, spot welding, packaging, and fuel burning.

Danver uses perchloroethylene (PCE) in its batch vapor degreaser and is therefore subject to the Halogenated Solvent cleaning MACT, 40 CFR 63 Subpart T.

The actual VOC emissions of the premises are less than 15 lb/day therefore the metal furniture operation is not subject to RCMA 22a-174-20(q).

## Section II: Emission Units Information

Emission units are set forth in Table II

TABLE II.A: EMISSION UNIT DESCRIPTION					
Emission Units	Grouped Emission Units	Emission Unit Description	Size Rating/ Design Capacity	Control Unit Description	Permit, Order, Registration #, NSPS, or MACT**
EMU 7		Ultra-Kool Vapor Degreaser	2,300 gals	Freeboard refrigeration device, reduced room draft, freeboard ratio of 1.0	CP/OP 189-0192; 40 CFR 63 Subpart T
EMU 12		Spray Adhesive Operation	0.1 gal/min	N/A	N/A

**It is not intended to incorporate by reference these NSR Permits, Orders, or Registrations into this Title V permit.**

### Section III: Applicable Requirements

The following tables contain terms and conditions for the operation of each identified Emission Unit.

#### A. EMISSION UNIT 7

Table III.A: Emission Unit 7 (EMU 7)		
Pollutants or Process Parameters	Limitations or Restrictions	Applicable Regulatory References/ Citations
1. Allowable Solvent	i. The permittee shall only use Perchloroethylene (PCE), CAS# 127-18-4 in this unit.	i. CP/OP 189-0192
2. VOC/ HAPs	i. The VOC/HAPs emission emitted shall not exceed 33.1 tpy.	i. CP/OP 189-0192
3. Solvent/Air Interface Area	i. The solvent/air interface area shall be greater than 1.21 m <sup>2</sup> (13 ft <sup>2</sup> )	i. 40 CFR 63.463(b)(2)

#### B. EMISSION UNIT 12

Table III.B: Emission Unit 12 (EMU 12)		
Pollutants or Process Parameters	Limitations or Restrictions	Applicable Regulatory References/ Citations
1. VOC	i. The permittee shall limit purchase for the premises of VOC containing coatings, including diluents and cleanup solvents but excluding water, to equal to or less than 1,500.00 gallons in any calendar year.	i. RCSA 22a-174-3c

#### C. 112(r) ACCIDENTAL RELEASE REQUIREMENTS

Should the facility, as defined in 40 CFR section 68.3, become subject to the accidental release prevention regulations in part 68, then the permittee shall submit a risk management plan (RMP) pursuant to 40 CFR section 68.12 by the date specified in section 68.10 and shall certify compliance with the requirements of part 68 as part of the annual compliance certification as required by 40 CFR section 70.6(c)(5).

#### D. STRATOSPHERIC OZONE DEPLETING SUBSTANCES (40 CFR SUBPART 82) REQUIREMENTS

The permittee shall comply with the standards for recycling and emissions reduction of products using ozone depleting substances pursuant to 40 CFR Part 82, Subpart F.



## **Section IV: Compliance Demonstration**

### **A. EMISSION UNIT 7 (EMU 7)**

#### **1. Design and Control Requirements**

- i. The permittee shall install and maintain a control combination consisting of freeboard refrigeration device, reduced room draft, and freeboard ratio of 1.0. [40 CFR 63.463(b)(2)(i); 40 CFR 63.463(a)(2)]
- ii. The unit shall have a freeboard ratio of 0.75 or greater. [40 CFR 63.463(a)(2)]
- iii. The permittee shall install and maintain a powered idling and downtime mode cover on the unit. The cover shall be readily opened or closed, it shall completely cover the unit openings when in place, and shall be free of cracks, holes, and other defects. [40 CFR 63.463(a)(1)(i); CP/OP 189-0192]
- iv. The permittee shall install and maintain on the unit, an automated part handling system capable of moving parts or parts baskets at a speed of 3.4 meters per minute (11 feet per minute) or less from the initial loading of parts through removal of cleaned parts. [40 CFR 63.463(a)(3); CP/OP 189-0192]
- v. The permittee shall equip the unit with a device that shuts off the sump heat if the sump liquid solvent level drops to the sump heater coils. [40 CFR 63.463(a)(4); CP/OP 189-0192]
- vi. The permittee shall install and maintain a primary condenser on the unit. [40 CFR 63.463(a)(6)]

#### **2. Monitoring and Testing Requirements**

- i. Maximum solvent consumption shall be based on any consecutive twelve (12) month time period and shall be determined by adding each month's solvent consumption to that of the previous eleven (11) months. Minimum solvent manifested (%) shall be determined by dividing the monthly solvent manifested by the monthly solvent consumed. These calculations shall be made on a monthly basis and made available for inspection by the Bureau upon request. [CP/OP 189-0192]
- ii. The permittee shall use a thermometer or thermocouple to measure and record the temperature at the center of the air blanket during the idling mode on a weekly basis. [40 CFR 63.466(a)(1)]
- iii. The permittee shall conduct a monthly visual inspection to determine if the cover is opening and closing properly, if it completely covers the cleaning machine openings when closed, and if it is free of cracks, holes, and other defects. The results of the inspection shall be recorded on a monthly basis. [40 CFR 63.466(b)(1)]
- iv. The permittee shall determine the hoist speed on a monthly basis by measuring the time it takes for the hoist to travel a measured distance. The speed is equal to the distance in meters divided by the time in minutes (meters per minute). If after the first year, no exceedances of the hoist speed are measured, the permittee may begin monitoring the hoist speed quarterly. [40 CFR 63.466(c)(1)&(2)]
- v. If an exceedance of the hoist speed occurs during quarterly monitoring, the permittee shall return to the monthly monitoring frequency until another year of compliance without an exceedance is demonstrated. [40 CFR 63.466(c)(3)]
- vi. If a permittee can demonstrate to the Commissioner and/or Administrator's satisfaction in the initial compliance report that the hoist cannot exceed a speed of 3.4 meters per minute (11 feet per minute), the required monitoring frequency is quarterly, including during the first year of compliance. [40 CFR 63.466(c)(4)]
- vii. If the reduced room draft is maintained by controlling room parameters (i.e., redirecting fans, closing doors and windows, etc.), the permittee shall conduct an initial monitoring test of the windspeed and of room parameters, quarterly monitoring of windspeed, and weekly monitoring of room parameters as specified below: [40 CFR 63.466(d)(1)]

## Section IV: Compliance Demonstration

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- a. Measure the windspeed within 6 inches above the top of the freeboard area of the unit using the procedure specified below:
    - 1. Determine the direction of the wind current by slowly rotating a velometer or similar device until the maximum speed is located;
    - 2. Orient a velometer in the direction of the wind current at each of the four corners of the machine;
    - 3. Record the reading for each corner; and
    - 4. Average the values obtained at each corner and record the average wind speed.
  - b. Monitor on a weekly basis the room parameters established during the initial compliance test that are used to achieve the reduced room draft.
- viii. If an enclosure (full or partial) is used to achieve a reduced room draft, the permittee shall conduct an initial monitoring test and, thereafter, monthly monitoring tests of the windspeed within the enclosure using the procedure specified below and a monthly visual inspection of the enclosure to determine if it is free of cracks, holes and other defects: [40 CFR 63.466(d)(2)]
- a. Determine the direction of the wind current in the enclosure by slowly rotating a velometer inside the entrance to the enclosure until the maximum speed is located.
  - b. Record the maximum wind speed.
- ix. During each monitoring period, the permittee shall ensure that the chilled air blanket temperature (in °F or °C), measured at the center of the air blanket, is no greater than 30 percent of the solvent's boiling point. [40 CFR 63.463(e)(2)(i)]
- x. During each monitoring period, the permittee shall ensure that the flow or movement of air across the top of the freeboard area of the unit or within the unit enclosure does not exceed 15.2 meters per minute (50 feet per minute) at any time as measured using the procedures in Sections IV.A.2.vii or viii of this permit. [40 CFR 63.463(e)(2)(ii)(A)]
- xi. During each monitoring period, the permittee shall establish and maintain the operating conditions under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) or less as described in Sections IV.A.2.viii & ix of this permit. [40 CFR 63.463(e)(2)(ii)(B)]
- xii. During each monitoring period, the permittee shall ensure that the cover is in place whenever parts are not in the solvent cleaning machine and completely covers the cleaning machine openings when in place. [40 CFR 63.463(e)(2)(iv)(A)]
- xiii. During each monitoring period, the permittee shall ensure that the idling-mode cover is maintained free of cracks, holes, and other defects. [40 CFR 63.463(e)(2)(iv)(B)]
- xiv. If any of the requirements of Sections IV.A.2.xii to xiv are not met, the permittee shall determine whether an exceedance has occurred using the criteria given below: [40 CFR 63.463(e)(3)]
- a. An exceedance has occurred if the requirements of Sections IV.A.2.xiv & xv of this permit have not been met.
  - b. An exceedance has occurred if the requirements of Sections IV.A.2.xii, xiii, & xvi of this permit have not been met and are not corrected within 15 days of detection. Adjustments or repairs shall be made to the solvent cleaning system or control device to reestablish required levels. The parameter must be remeasured immediately upon adjustment or repair and demonstrated to be within required limits.

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- xv. The permittee shall report all exceedances and all corrections and adjustments made to avoid an exceedance as specified in Section IV.A.4.iv of this permit. [40 CFR 63.463(e)(4)]

### **3. Record Keeping Requirements**

- i. The permittee shall maintain a monthly record of the amount of solvent consumed and the monthly solvent manifested in pounds per month. [CP/OP 189-0192]
- ii. The permittee shall record the measured temperature at the center of the air blanket during the idling mode on a weekly basis. [40 CFR 63.466(a)(1)]
- iii. The permittee shall record on a monthly basis, the result of the inspection conducted to determine if the cover is opening and closing properly, if it completely covers the cleaning machine openings when closed, and if it is free of cracks, holes, and other defects. [40 CFR 63.466(b)(1)]
- iv. The permittee shall maintain for the life of the unit and associated equipment, the owner's manuals, or if not available, written maintenance and operating procedures, for the unit and control equipment. [40 CFR 63.467(a)(1)]
- v. The permittee shall maintain the date of installation for the unit and all of its control devices. If the exact date for installation is not known, a letter certifying that the unit and its control devices were installed prior to, or on, November 29, 1993, or after November 29, 1993, may be substituted. [40 CFR 63.467(a)(2)]
- vi. The permittee shall maintain records of the halogenated HAP solvent content for each solvent used in the unit. [40 CFR 63.467(a)(5)]
- vii. The permittee shall maintain the results of all control device monitoring required under Section IV.2 of this permit. [40 CFR 63.467(b)(1)]
- viii. The permittee shall maintain the information on the actions taken to comply with Sections IV.A.2.xii to xviii of this permit. This information shall include records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels. [40 CFR 63.467(b)(2)]
- ix. The permittee shall maintain the estimates of annual solvent consumption for the unit. [40 CFR 63.467(b)(3)]
- x. The permittee shall maintain all records in written or electronic form on the premises for a minimum of five (5) years after such record is made unless otherwise specified. [40 CFR 63.467(a); 40 CFR 63.467(b); RCSA 22a-174-33(o)(2)]

### **4. Reporting Requirements**

- i. The permittee shall submit an initial notification to the Commissioner and the Administrator an initial notification report. This report shall include the following information specified below: [40 CFR 63.468(a)]
  - a. The name and address of the permittee;
  - b. The address (i.e., physical location) of the unit;
  - c. A brief description of the unit including machine type (batch vapor, batch cold, vapor in-line or cold in-line), solvent/air interface area, and existing controls;
  - d. The date of installation for the unit or a letter certifying that the unit and its control devices were installed prior to, or after, November 29, 1993;
  - e. The anticipated compliance approach for the unit; and
  - f. An estimate of annual halogenated HAP solvent consumption for the unit.

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- ii. The permittee shall submit to Commissioner and the Administrator an initial statement of compliance for the unit. This report shall be submitted immediately if not yet submitted. This statement shall include the following requirements: [40 CFR 63.468(d)]
  - a. The name and address of the permittee;
  - b. The address (i.e., physical location) of the unit;
  - c. A list of the control equipment used to achieve compliance for the unit;
  - d. For each piece of control equipment required to be monitored, a list of the parameters that are monitored and the values of these parameters measured on or during the first month after the compliance date; and
  - e. Conditions to maintain the operating conditions under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) or less.
- iii. The permittee shall submit an annual report by February 1 of the year for the previous year. This report shall include the requirements specified below: [40 CFR 63.468(f)]
  - a. A signed statement from the permittee or his designee stating that, "All operators of the unit have received training on the proper operation of solvent cleaning machines and their control devices sufficient to pass the test required in 40 CFR 63 Subpart T, Appendix A."
  - b. An estimate of solvent consumption for the unit during the reporting period.
- iv. The permittee shall submit an exceedance report to the Commissioner and the Administrator semiannually except when, the Commissioner and the Administrator determines on a case-by-case basis that more frequent reporting is necessary to accurately assess the compliance status of the source or, an exceedance occurs. Once an exceedance has occurred the permittee shall follow a quarterly reporting format until a request to reduce reporting frequency under Section IV.A.4.v of this permit of this permit is approved. Exceedance reports shall be delivered or postmarked by the 30th day following the end of each calendar half or quarter, as appropriate. The exceedance report shall include the following applicable information: [40 CFR 63.468(h)]
  - a. Information on the actions taken to comply with Sections IV.A.2.xii to xviii of this permit. This information shall include records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels;
  - b. If an exceedance has occurred, the reason for the exceedance and a description of the actions taken; and
  - c. If no exceedances of a parameter have occurred, or a piece of equipment has not been inoperative, out of control, repaired, or adjusted, such information shall be stated in the report.
- v. The permittee who is required to submit an exceedance report on a quarterly (or more frequent) basis may reduce the frequency of reporting to semiannual if the following conditions are met. [40 CFR 63.468(i)]
  - a. The source has demonstrated a full year of compliance without an exceedance;
  - b. The permittee continues to comply with all relevant record keeping and monitoring requirements; and
  - c. The Commissioner and the Administrator does not object to a reduced frequency of reporting for the affected source. [40 CFR 63.10(e)(3)(iii) of Subpart A (General Provisions)]

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## **5. Work and Operational Practices**

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- i. Air disturbances across the unit opening(s) shall be controlled by the permittee: [40 CFR 63.463(d)(1)(i) & (ii)]
  - a. by keeping the cover to the solvent cleaning machine in place during the idling mode, and during the downtime mode unless either the solvent has been removed from the machine or maintenance or monitoring is being performed that requires the cover to not be in place; or
  - b. by achieving a reduced room draft of no more than 15.2 m/min (50 ft/min)
- ii. The permittee shall minimize the solvent carryout by: [CP/OP 189-0192]
  - a. Racking parts to allow complete drainage;
  - b. Moving parts in and out of the degreasing unit at less than 3.3 meters per minute (11 feet per minute);
  - c. Holding the parts in the vapor zone at least thirty (30) seconds or until condensation ceases, whichever is longer;
  - d. Tipping out any pools of solvent on the cleaned parts before removal from the vapor zone; and
  - e. Allowing parts to dry within the degreasing unit for at least fifteen seconds or until visually dry, whichever is longer.
- iii. The permittee shall ensure that the parts baskets or the parts being cleaned in the unit shall not occupy more than 50 percent of the solvent/air interface area unless the parts baskets or parts are introduced at a speed of 0.9 meters per minute (3 feet per minute) or less. [40 CFR 63.463(d)(2)]
- iv. Any spraying operations carried out by the permittee shall be done within the vapor zone or within a section of the unit that is not directly exposed to the ambient air (i.e., a baffled or enclosed area of the unit). [40 CFR 63.463(d)(3); CP/OP 189-0192]
- v. The permittee shall make sure that parts are oriented so that the solvent drains from them freely. Parts having cavities or blind holes shall be tipped or rotated by the permittee before being removed from the unit unless an equally effective approach has been approved by the Commissioner and/or Administrator. [40 CFR 63.463(d)(4)]
- vi. Parts baskets or parts shall not be removed by the permittee from the unit until condensation and/or dripping has stopped. [40 CFR 63.463(d)(5)]
- vii. The permittee shall ensure that during startup of the unit, the primary condenser is turned on before the sump heater is turned on. [40 CFR 63.463(d)(6)]
- viii. The permittee shall ensure that during shutdown of the unit, the sump heater is turned off and the solvent vapor layer is allowed to stop boiling and collapse before the primary condenser is turned off. [40 CFR 63.463(d)(7)]
- ix. When solvent is added or drained from the unit, the permittee shall ensure that the solvent is transferred using threaded or other leakproof couplings and that the end of the pipe in the solvent sump is located beneath the liquid solvent surface. [40 CFR 63.463(d)(8)]
- x. The permittee shall maintain the unit and associated controls as recommended by the manufacturers of the equipment or use alternative maintenance practices that have been demonstrated to the Administrator's satisfaction to achieve the same or better results as those recommended by the manufacturer. [40 CFR 63.463(d)(9)]
- xi. The permittee shall complete and pass the applicable sections of the test of solvent cleaning procedures in appendix A of 40 CFR 63 if requested during an inspection by the Commissioner

## **Section IV: Compliance Demonstration**

and/or Administrator. [40 CFR 63.463(d)(10)]

- xii. The permittee shall collect and store in closed containers, waste solvent, still bottoms, and sump bottoms. The closed containers shall contain a device that would allow pressure relief, but would not allow liquid solvent to drain from the container. [40 CFR 63.463(d)(11)]
- xiii. The permittee shall not dispose of waste degreasing solvent or transfer it to another party, such that greater than 20 percent of the waste degreasing solvent (by weight) can evaporate into the atmosphere. [CP/OP 189-0192]
- xiv. The permittee shall not clean (or degrease) porous or absorbent materials, such as fabric, leather, wood, rope, sponges, and paper products in the unit. [40 CFR 63.463(d)(12); CP/OP 189-0192]
- xv. The permittee shall not occupy more than half of the unit's open top area with a workload. [CP/OP 189-0192]
- xvi. The permittee shall not load the unit to the point where the vapor level would drop more than ten (10) centimeters (4 inches) when the workload is removed from the vapor zone. [CP/OP 189-0192]
- xvii. The permittee shall operate the unit so as to prevent water from being visually detectable in solvent exiting the water separator. [CP/OP 189-0192]
- xviii. The permittee shall not provide exhaust ventilation exceeding twenty (20) cubic meters per minute per square meter (65 cubic feet per minute per square foot) of degreasing unit open area, unless necessary to meet OSHA requirements CP/OP 189-0192]
- xix. The permittee shall not operate the unit upon the occurrence of any visible solvent leak until such leak is repaired. [CP/OP 189-0192]
- xx. The permittee shall provide a permanent, conspicuous label on or posted near each unit summarizing the applicable operating requirements. [CP/OP 189-0192]
- xxi. If the open top vapor degreaser is equipped with a lip exhaust, the permittee shall ensure that the required cover is located below the lip exhaust. [CP/OP 189-0192]

### **B. EMISSION UNIT 12 (EMU 12)**

#### **1. Monitoring and Testing Requirements**

- i. The permittee shall limit purchase for the premises of VOC containing coatings, including diluents and cleanup solvents but excluding water, to equal to or less than 1,500.00 gallons in any calendar year. [RCSA 22a-174-3c(b)(10)]

#### **2. Record Keeping Requirements**

- i. The permittee shall maintain purchase records to demonstrate compliance with applicable coating and solvent limitations. [RCSA 22a-174-3c(c)(1)]
- ii. The permittee shall maintain purchase records for five (5) years from the date such records are created. [RCSA 22a-174-3c(c)(3)]

#### **3. Reporting Requirements**

- i. The permittee shall make purchase records available to the commissioner to inspect and copy upon request. [RCSA 22a-174-3c(c)(2)]

## Section V: Premises-Wide General Requirements

<b>Table V: PREMISES-WIDE GENERAL REQUIREMENTS</b>		
<b>Pollutants or Process Parameters</b>	<b>Applicable Regulatory References/Citations</b>	<b>Limitations or Restrictions</b>
Opacity	RCSA 22a-174-18(b)(1) & (2)	<p>For stationary sources without opacity CEM requirement. Except as provided by RCSA 22a-174-18(j), the permittee shall not exceed the following visible emissions limits: [22a-174-18(b)(1)(A) &amp; (B)]</p> <p>(A) Twenty percent (20%) opacity during any six-minute block average as measured by 40 CFR 60, Appendix A, Reference method 9; or</p> <p>(B) Forty percent (40%) opacity s measured by 40 CFR 60, Appendix A, Reference method 9, reduced to a one-minute block average.</p> <p>For stationary sources with opacity CEM requirement. Except as provided by RCSA 22a-174-18(j), the permittee shall not exceed the following visible emissions limits: [22a-174-18(b)(2)(A) &amp; (B)]</p> <p>(A) Twenty percent (20%) opacity during any six-minute block average; or</p> <p>(B) Forty percent (40%) opacity during any one-minute block average.</p>
Annual Emission Statements	RCSA §22a-174-4	The permittee shall submit annual emission inventory statements requested by the Commissioner as specified in RCSA §22a-174-4(d)(1).
Emergency Episode Procedures	RCSA §22a-174-6	The permittee shall comply with the procedures for emergency episodes as specified in RCSA §22a-174-6.
Public Availability of Information	RCSA §22a-174-10	The public availability of information shall apply, as specified in RCSA 22a-174-10.
Prohibition against Concealment/ Circumvention	RCSA §22a-174-11	The permittee shall comply with the prohibition against concealment or circumvention as specified in RCSA 22a-174-11.
Open Burning	CGS §22a-174(f)	The permittee is prohibited from conducting open burning, except as may be allowed by CGS 22a-174(f).
Emission Fees	RCSA §22a-174-26	The permittee shall pay an emission fee in accordance with RCSA §22a-174-26(d).

## Section VI: Compliance Schedule

**NOT APPLICABLE**

Table VI: COMPLIANCE SCHEDULE				
Emission Unit	Applicable Regulations	Steps required for achieving compliance (Milestones)	Date by which each step is to be completed	Dates for monitoring, record keeping, and reporting
N/A				



## **Section VII: State Enforceable Terms and Conditions**

Only the Commissioner of the Department of Environmental Protection has the authority to enforce the terms, conditions and limitations contained in this section.

- A.** This permit does not relieve the permittee of the responsibility to conduct, maintain and operate the emissions units in compliance with all applicable requirements of any other Bureau of the Department of Environmental Protection or any federal, local or other state agency. Nothing in this permit shall relieve the permittee of other obligations under applicable federal, state and local law.
- B.** Nothing in this permit shall affect the Commissioner's authority to institute any proceeding or take any other action to prevent or abate violations of law, prevent or abate pollution, investigate air pollution, recover costs and natural resource damages, and to impose penalties for violations of law, including but not limited to violations of this or any other permit issued to the permittee by the Commissioner.
- C.** Odors: The permittee shall not cause or permit the emission of any substance or combination of substances which creates or contributes to an odor beyond the property boundary of the premises as set forth in RCSA Section 22a-174-23.
- D.** Noise: The permittee shall operate in compliance with the regulations for the control of noise as set forth in RCSA Sections 22a-69-1 through 22a-69-7.4, inclusive.
- E.** Hazardous Air Pollutants (HAPs): The permittee shall operate in compliance with the regulations for the control of HAPs as set forth in RCSA Section 22a-174-29.
- F.** Open Burning: The permittee is prohibited from conducting open burning, except as may be allowed by CGS Section 22a-174(f).
- G.** Fuel Sulfur Content: The permittee shall not use #2 heating oil that exceeds three-tenths of one percent sulfur by weight as set forth in CGS Section 16a-21a.
- H.** Reporting of emissions of greenhouse gases: In accordance with CGS Section 22a-200b(b), not later than April 15, 2006, and annually thereafter, the owner or operator of any facility that is required to report air emissions data to the Department of Environmental Protection pursuant to Title V of the federal Clean Air Act and that has stationary emissions sources that emit greenhouse gases shall report to the regional registry direct stack emissions of greenhouse gases from such sources. The owner or operator shall report all greenhouse gas emissions in a type and format that the regional registry can accommodate.

## Section VIII: Permit Shield

### NO PERMIT SHIELD GRANTED

Table VIII: PERMIT SHIELD				
Regulated Pollutants	Emissions Units	Applicable Requirement or Non-Applicable Requirement Descriptions	Applicable Regulatory References/ Citations	*Permit Shield Indicate
N/A				

\*For “Permit Shield Indicate”, use AR to indicate Applicable Requirement and NR for Non- Applicable Requirement

## **Section IX: Title V Requirements**

The Administrator of the United States Environmental Protection Agency and the Commissioner of Environmental Protection have the authority to enforce the terms and conditions contained in these sections.

### **A. SUBMITTALS TO THE COMMISSIONER & ADMINISTRATOR**

The date of submission to the Commissioner of any document required by this permit shall be the date such document is received by the Commissioner. The date of any notice by the Commissioner under this permit, including, but not limited to notice of approval or disapproval of any document or other action, shall be the date such notice is delivered or the date three days after it is mailed by the Commissioner, whichever is earlier. Except as otherwise specified in this permit, the word "day" means calendar day. Any document or action which is required by this permit to be submitted or performed by a date which falls on a Saturday, Sunday or legal holiday shall be submitted or performed by the next business day thereafter.

Any document required to be submitted to the Commissioner under this permit shall, unless otherwise specified in writing by the Commissioner, be directed to: Office of the Assistant Director; Compliance & Field Operations Division; Bureau of Air Management; Department of Environmental Protection; 79 Elm Street, 5th Floor; Hartford, Connecticut 06106-5127.

Any submittal to the Administrator of the U. S. Environmental Protection Agency shall be in a computer-readable format and addressed to: Director, Air Compliance Program; Attn: Air Compliance Clerk; Office of Environmental Stewardship; US EPA, Region 1; One Congress Street; Suite 1100 (SEA); Boston, MA 02114-2023.

### **B. CERTIFICATIONS [RCSA § 22a-174-33(b)]**

In accordance with Section 22a-174-33(b) of the RCSA, any report or other document required by this Title V permit and any other information submitted to the Commissioner or Administrator shall be signed by an individual described in Section 22a-174-2a(a) of the RCSA, or by a duly authorized representative of such individual. Any individual signing any document pursuant to Section 22a-174-33(b) of the RCSA shall examine and be familiar with the information submitted in the document and all attachments thereto, and shall make inquiry of those individuals responsible for obtaining the information to determine that the information is true, accurate, and complete, and shall also sign the following certification as provided in Section 22a-174-2a(a)(4) of the RCSA:

“I have personally examined and am familiar with the information submitted in this document and all attachments thereto, and I certify that based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information, the submitted information is true, accurate and complete to the best of my knowledge and belief. I understand that any false statement made in the submitted information may be punishable as a criminal offense under Section 22a-175 of the Connecticut General Statutes, under Section 53a-157b of the Connecticut General Statutes, and in accordance with any applicable statute.”

### **C. SIGNATORY RESPONSIBILITY [RCSA § 22a-174-2a(a)]**

For purposes of signing any Title V-related application, document, report or certification required by section 22a-174-33 of the Regulations of Connecticut State Agencies, any corporation's duly authorized representative may be either a named individual or any individual occupying a named position. Such named individual or individual occupying a named position is a duly authorized representative if such

## **Section IX: Title V Requirements**

individual is responsible for the overall operation of one or more manufacturing, production or operating facilities subject to section 22a-174-33 of the Regulations of Connecticut State Agencies and either:

1. The facilities employ more than two-hundred fifty (250) persons or have gross annual sales or expenditures exceeding twenty-five (25) million dollars in second quarter 1980 dollars; or
2. The delegation of authority to the duly authorized representative has been given in writing by an officer of the corporation in accordance with corporate procedures and the following:
  - (i) Such written authorization specifically authorizes a named individual, or a named position, having responsibility for the overall operation of the Title V premises or activity,
  - (ii) Such written authorization is submitted to the commissioner and has been approved by the commissioner in advance of such delegation. Such approval does not constitute approval of corporate procedures, and
  - (iii) If a duly authorized representative is a named individual in an authorization submitted under subclause (ii) of this subparagraph and a different individual is assigned or has assumed the responsibilities of the duly authorized representative, or, if a duly authorized representative is a named position in an authorization submitted under subclause (ii) of this subparagraph and a different named position is assigned or has assumed the duties of the duly authorized representative, a new written authorization shall be submitted to the commissioner prior to or together with the submission of any application, document, report or certification signed by such representative.

### **D. ADDITIONAL INFORMATION [RCSA § 22a-174-33(j)(1)(X)]**

The permittee shall submit additional information in writing, at the Commissioner's request, within thirty (30) days of receipt of notice from the Commissioner or by such other date specified by the Commissioner, whichever is earlier, including information to determine whether cause exists for modifying, revoking, reopening, reissuing, or suspending the permit or to determine compliance with the permit.

In addition, within fifteen days of the date the permittee becomes aware of a change in any information submitted to the Commissioner under this permit or of any change in any information contained in the application, or that any such information was inaccurate or misleading or that any relevant information was omitted, the permittee shall submit the changed, corrected, or omitted information to the Commissioner.

### **E. MONITORING REPORTS [RCSA § 22a-174-33(o)(1)]**

A permittee, required to perform monitoring pursuant this permit, shall submit to the Commissioner, on forms prescribed by the Commissioner, written monitoring reports on January 30 and July 30 of each year or on a more frequent schedule if specified in such permit. Such monitoring reports shall include the date and description of each deviation from a permit requirement including, but not limited to:

1. Each deviation caused by upset or control equipment deficiencies; and
2. Each deviation of a permit requirement that has been monitored by the monitoring systems required under this permit, which has occurred since the date of the last monitoring report; and

## **Section IX: Title V Requirements**

3. Each deviation caused by a failure of the monitoring system to provide reliable data.

### **F. PREMISES RECORDS [RCSA § 22a-174-33(o)(2)]**

Unless otherwise required by this permit, the permittee shall make and keep records of all required monitoring data and supporting information for at least five (5) years from the date such data and information were obtained. The permittee shall make such records available for inspection at the site of the subject source, and shall submit such records to the Commissioner upon request. The following information, in addition to required monitoring data, shall be recorded for each permitted source:

1. The type of monitoring or records used to obtain such data, including record keeping;
2. The date, place, and time of sampling or measurement;
3. The name of the individual who performed the sampling or the measurement and the name of such individual's employer;
4. The date(s) on which analyses of such samples or measurements were performed;
5. The name and address of the entity that performed the analyses;
6. The analytical techniques or methods used for such analyses;
7. The results of such analyses;
8. The operating conditions at the subject source at the time of such sampling or measurement; and
9. All calibration and maintenance records relating to the instrumentation used in such sampling or measurements, all original strip-chart recordings or computer printouts generated by continuous monitoring instrumentation, and copies of all reports required by the subject permit.

### **G. PROGRESS REPORTS [RCSA § 22a-174-33(q)(1)]**

The permittee shall, on January 30 and July 30 of each year, or on a more frequent schedule if specified in this permit, submit to the Commissioner a progress report on forms prescribed by the Commissioner, and certified in accordance with Section 22a-174-2a(a)(5) of the RCSA. Such report shall describe the permittee's progress in achieving compliance under the compliance plan schedule contained in this permit. Such progress report shall:

1. Identify those obligations under the compliance plan schedule in the permit which the permittee has met, and the dates on which they were met; and
2. Identify those obligations under the compliance plan schedule in this permit which the permittee has not timely met, explain why they were not timely met, describe all measures taken or to be taken to meet them and identify the date by which the permittee expects to meet them.

Any progress report prepared and submitted pursuant to Section 22a-174-33(q)(1) of the RCSA shall be simultaneously submitted by the permittee to the Administrator.

## **Section IX: Title V Requirements**

### **H. COMPLIANCE CERTIFICATIONS [RCSA § 22a-174-33(q)(2)]**

The permittee shall, on January 30 of each year, or on a more frequent schedule if specified in this permit, submit to the Commissioner, a written compliance certification certified in accordance with Section 22a-174-2a(a)(5) of the RCSA and which includes the information identified in Title 40 CFR 70.6(c)(5)(iii)(A) to (C), inclusive.

Any compliance certification prepared and submitted pursuant to Section 22a-174-33(q)(2) of the RCSA shall be simultaneously submitted by the permittee to the Administrator.

### **I. PERMIT DEVIATION NOTIFICATIONS [RCSA § 22a-174-33(p)]**

Notwithstanding Subsection D of Section IX of this permit, the permittee shall notify the Commissioner in writing, on forms prescribed by the Commissioner, of any deviation from an emissions limitation, and shall identify the cause or likely cause of such deviation, all corrective actions and preventive measures taken with respect thereto, and the dates of such actions and measures as follows:

1. For any hazardous air pollutant, no later than twenty-four (24) hours after such deviation commenced; and
2. For any other regulated air pollutant, no later than ten (10) days after such deviation commenced.

### **J. PERMIT RENEWAL [RCSA § 22a-174-33(j)(1)(B)]**

All of the terms and conditions of this permit shall remain in effect until the renewal permit is issued or denied provided that a timely renewal application is filed in accordance with Sections 22a-174-33(g), -33(h), and -33(i) of the RCSA.

### **K. OPERATE IN COMPLIANCE [RCSA § 22a-174-33(j)(1)(C)]**

The permittee shall operate the source in compliance with the terms of all applicable regulations, the terms of this permit, and any other applicable provisions of law. In addition, any noncompliance constitutes a violation of the Clean Air Act and Chapter 446c of the Connecticut General Statutes and is grounds for federal and/or state enforcement action, permit termination, revocation and reissuance, or modification, and denial of a permit renewal application.

### **L. COMPLIANCE WITH PERMIT [RCSA § 22a-174-33(j)(1)(G)]**

This permit shall not be deemed to:

1. preclude the creation or use of emission reduction credits or the trading of such credits in accordance with Sections 22a-174-33(j)(1)(I) and 22a-174-33(j)(1)(P) of the RCSA, provided that the Commissioner's prior written approval of the creation, use, or trading is obtained;
2. authorize emissions of an air pollutant so as to exceed levels prohibited under 40 CFR Part 72;
3. authorize the use of allowances pursuant to 40 CFR Parts 72 through 78, inclusive, as a defense to noncompliance with any other applicable requirement; or

## **Section IX: Title V Requirements**

4. impose limits on emissions from items or activities specified in Sections 22a-174-33(g)(3)(A) and (B) of the RCSA unless imposition of such limits is required by an applicable requirement.

### **M. INSPECTION TO DETERMINE COMPLIANCE [RCSA § 22a-174-33(j)(1)(M)]**

The Commissioner may, for the purpose of determining compliance with the permit and other applicable requirements, enter the premises at reasonable times to inspect any facilities, equipment, practices, or operations regulated or required under the permit; to sample or otherwise monitor substances or parameters; and to review and copy relevant records lawfully required to be maintained at such premises in accordance with this permit. It shall be grounds for permit revocation should entry, inspection, sampling, or monitoring be denied or effectively denied, or if access to and the copying of relevant records is denied or effectively denied.

### **N. PERMIT AVAILABILITY**

The permittee shall have available at the facility at all times a copy of this Title V Operating Permit.

### **O. SEVERABILITY CLAUSE [RCSA § 22a-174-33(j)(1)(R)]**

The provisions of this permit are severable. If any provision of this permit or the application of any provision of this permit to any circumstance is held invalid, the remainder of this permit and the application of such provision to other circumstances shall not be affected.

### **P. NEED TO HALT OR REDUCE ACTIVITY [RCSA § 22a-174-33(j)(1)(T)]**

It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

### **Q. PERMIT REQUIREMENTS [RCSA § 22a-174-33(j)(1)(V)]**

The filing of an application or of a notification of planned changes or anticipated noncompliance does not stay the permittee's obligation to comply with this permit.

### **R. PROPERTY RIGHTS [RCSA § 22a-174-33(j)(1)(W)]**

This permit does not convey any property rights or any exclusive privileges. This permit is subject to, and in no way derogates from any present or future property rights or other rights or powers of the State of Connecticut, and is further subject to any and all public and private rights and to any federal, state or local laws or regulations pertinent to the facility or regulated activity affected thereby, including Section 4-181a(b) of the Connecticut General Statutes and Section 22a-3a-5(b) of the RCSA. This permit shall neither create nor affect any rights of persons who are not parties to this permit.

### **S. ALTERNATIVE OPERATING SCENARIO RECORDS [RCSA § 22a-174-33(o)(3)]**

The permittee shall, contemporaneously with making a change authorized by this permit from one alternative operating scenario to another, maintain a record at the premises indicating when changes are made from one operating scenario to another and shall maintain a record of the current alternative operating scenario.

## **Section IX: Title V Requirements**

### **T. OPERATIONAL FLEXIBILITY AND OFF-PERMIT CHANGES [RCSA § 22a-174-33(r)(2)]**

The permittee may engage in any action allowed by the Administrator in accordance with 40 CFR 70.4(b)(12)(i) to (iii)(B) inclusive, and 40 CFR 70.4(b)(14)(i) to (iv), inclusive without a Title V non-minor permit modification, minor permit modification or revision and without requesting a Title V non-minor permit modification, minor permit modification or revision provided such action does not:

1. constitute a modification under 40 CFR 60, 61 or 63,
2. exceed emissions allowable under the subject permit,
3. constitute an action which would subject the permittee to any standard or other requirement pursuant to 40 CFR 72 to 78, inclusive, or
4. constitute a non-minor permit modification pursuant to Section 22a-174-2a(d)(4) of the RCSA.

At least seven (7) days before initiating an action specified in Section 22a-174-33(r)(2)(A) of the RCSA, the permittee shall notify the Administrator and the Commissioner in writing of such intended action.

### **U. INFORMATION FOR NOTIFICATION [RCSA § 22a-174-33(r)(2)(A)]**

Written notification required under Section 22a-174-33(r)(2)(A) of the RCSA shall include a description of each change to be made, the date on which such change will occur, any change in emissions that may occur as a result of such change, any Title V permit terms and conditions that may be affected by such change, and any applicable requirement that would apply as a result of such change. The permittee shall thereafter maintain a copy of such notice with the Title V permit. The Commissioner and the permittee shall each attach a copy of such notice to their copy of the permit.

### **V. TRANSFERS [RCSA § 22a-174-2a(g)]**

No person other than the permittee shall act or refrain from acting under the authority of this permit unless this permit has been transferred to another person in accordance with Section 22a-174-2a(g) of the RCSA.

The proposed transferor and transferee of a permit shall submit to the Commissioner a request for a permit transfer on a form provided by the Commissioner. A request for a permit transfer shall be accompanied by any fees required by any applicable provision of the general statutes or regulations adopted thereunder. The Commissioner may also require the proposed transferee to submit with any such request, the information identified in CGS Section 22a-6m.

### **W. REVOCATION [RCSA § 22a-174-2a(h)]**

The Commissioner may revoke this permit on his own initiative or on the request of the permittee or any other person, in accordance with Section 4-182(c) of the Connecticut General Statutes, Section 22a-3a-5(d) of the RCSA, and any other applicable law. Any such request shall be in writing and contain facts and reasons supporting the request. The permittee requesting revocation of this permit shall state the requested date of revocation and provide the Commissioner with satisfactory evidence that the emissions authorized by this permit have been permanently eliminated.



## **Section IX: Title V Requirements**

Pursuant to the Clean Air Act, the Administrator has the power to revoke this permit. Pursuant to the Clean Air Act, the Administrator also has the power to reissue this permit if the Administrator has determined that the Commissioner failed to act in a timely manner on a permit renewal application.

This permit may be modified, revoked, reopened, reissued, or suspended by the Commissioner, or the Administrator in accordance with Section 22a-174-33(r) of the RCSA, Connecticut General Statutes Section 22a-174c, or Section 22a-3a-5(d) of the RCSA.

### **X. REOPENING FOR CAUSE [RCSA § 22a-174-33(s)]**

This permit may be reopened by the Commissioner, or the Administrator in accordance with Section 22a-174-33(s) of the RCSA.

### **Y. CREDIBLE EVIDENCE**

Notwithstanding any other provision of this permit, for the purpose of determining compliance or establishing whether a permittee has violated or is in violation of any permit condition, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information.